ESTTA Tracking number:

ESTTA695978 09/15/2015

Filing date:

# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92059301
Party	Defendant Grange Mutual Casualty Company
Correspondence Address	WILLIAM H OLDACH III VORYS SATER SEYMOUR & PEASE LLP 1909 K STREET NW, 9TH FLOOR WASHINGTON, DC 20006 UNITED STATES Itgeyer@vorys.com, iplaw@vorys.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Laura Talley Geyer
Filer's e-mail	Itgeyer@vorys.com, iplaw@vorys.com
Signature	/Laura Talley Geyer/
Date	09/15/2015
Attachments	Grange Consent Motion Extension.pdf(7546 bytes)

# THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Registration Nos. 3,821,201 and 3,723,315

For the mark: GRANGE INSURANCE and GRANGE INSURANCE and Design

**GRANGE INSURANCE ASSOCIATION** 

Petitioner,

v.

Cancellation No. 92059301

GRANGE MUTUAL CASUALTY COMPANY,

Registrant.

#### **CONSENTED MOTION FOR EXTENSION**

Pursuant to 37 C.F.R. § 2.121(a) and section 509 of the Trademark Trial and Appeal Board Manual of Procedure, Petitioner and Registrant both move that deadlines in the above-captioned matter be extended 30 days in order for the parties to continue active discussions to settle this matter. Registrant has obtained Petitioner's consent to request this extension.

Accordingly, the parties both request that the dates be re-set as follows:

Discovery Period to Close	October 18, 2015
Plaintiff Pretrial Disclosures	December 2, 2015
Plaintiff's 30-day Trial Period Ends	January 16, 2016
Defendant's Pretrial Disclosures	January 31, 2016
Defendant's 30-day Trial Period ends	March 16, 2016
Plaintiff's Rebuttal Disclosures	March 31, 2016
Plaintiff's 15-day Rebuttal Period Ends	April 30, 2016

### Respectfully Submitted:

\_\_\_\_

Date September 15, 2015

William H. Oldach III Cory M. Amron Laura T. Geyer Vorys, Sater, Seymour and Pease LLP 1909 K Street, NW, 9th Floor Washington, DC 20006 Telephone: 202.467.8800

Facsimile: 202.467.8800 Facsimile: 202.533.9099 E-Mail: iplaw@vorys.com

Attorneys for Registrant

### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Consented Motion for Extension was served on September 15, 2015, by email, on:

John Crosetto Garvey, Schubert & Barer 1191 Second Ave. Ste 1800 Seattle, WA 98101 jcrosetto@gsblaw.com

Laura T. Geyer

Jan J Yy